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August 27, 2015

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The Honorable Tom Wheeler
Chairman
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

**Re: Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund
WC Docket Nos. 11-42, 09-197, 10-90; FCC 15-71**

Dear Chairman Wheeler:

Cigna welcomes the opportunity to respond to the Federal Communication Commission's (the Commission) proposed rule regarding Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund (WC Docket Nos. 11-42, 09-197, 10-90; FCC 15-71). We appreciate the Commission's efforts to streamline the eligibility verification process and eliminate fraud, waste and abuse from the Lifeline Program. Our response provides the perspective of a health plan that serves a vulnerable population and recognizes the connection between Lifeline and improving access to health care, care management, and improving overall health while controlling costs for those with complex health needs. From this perspective, we believe it is vital that Medicaid eligibility continue to be a qualifying pathway for participation in the Lifeline Program.

Cigna Corporation, together with its subsidiaries (either individually or collectively referred to as Cigna), is a global health services organization dedicated to helping people improve their health, well-being and sense of security. Our subsidiaries are major providers of medical, dental, disability, life and accident insurance and related products and services. Worldwide, we offer peace of mind and a sense of security to our customers seeking protection for themselves and their families at critical points in their lives.

Cigna serves over two million Medicare and Medicaid beneficiaries through our Medicare Advantage (MA), Part D, Medicare Supplemental, and Medicaid offerings, including almost 500,000 members in MA. About one third of these beneficiaries are dually-eligible for Medicare and Medicaid. Our focus on this population has allowed us to develop a unique approach to healthcare coverage for low-income beneficiaries, many of whom live with chronic conditions. We have a deep understanding of the needs and challenges facing both patients and physicians, and thus have created a collaborative model that provides more access to high quality care for our customers while supplying physicians what they need to deliver that care.

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The Commission asked for input on the impact to Lifeline Program participants if Medicaid is removed from the list of Lifeline qualifying programs. Our experience has taught us that communication is one of the biggest challenges in providing services to dual-eligible members, including some who may lack adequate housing, utilities, or support networks. An internal analysis found that our dual-eligible members are 50 percent more likely to have an incorrect or missing phone number in our member database. Without good contact information, it is very difficult to ensure that our members are able to make appointments for care, follow up with reminders to schedule preventive screenings and tests, discuss chronic care needs with nurses and case managers, or refill needed prescriptions.

Cigna has begun an important initiative to address this challenge by partnering with a Lifeline vendor to close the gap and provide more low-income individuals access to reliable telephonic communication. The vendor will be providing us with a refresh of phone numbers for Cigna members who sign up for the Lifeline Program, which will support our care coordination efforts and facilitate communication between the member and our physicians, case managers, pharmacists, and other providers. We believe that low-income patients and the health plans that serve them, like Cigna, will all benefit from increased communication.

It is important that Medicaid remain a qualifying program for Lifeline eligibility because Cigna only has line of sight to a member's Medicaid eligibility. Removing Medicaid as an eligibility pathway would make our Lifeline initiative impossible, and greatly limit the effectiveness of our care coordination program.

Recommendation: Cigna recommends that Medicaid continue to be used as a qualifying program for eligibility in the Lifeline Program.

Thank you for your consideration of these comments.

Respectfully,



David Schwartz